

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

State of New York, *et al.*

*Plaintiffs,*

v.

Case No. 1:25-cv-1144-JAV

U.S. Department of the Treasury, *et. al.*

*Defendants.*

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I, Nathaniel Reboja, declare under penalty of perjury:

1. I currently serve as the Assistant Commissioner for Information and Security Services and Chief Information Officer for the Bureau of the Fiscal Service's (BFS or the Bureau). I report to Joe Gioeli III, the Bureau's Deputy Commissioner for Transformation and Modernization. I am a career civil servant. I have been employed at the Bureau for over three years.
2. In my current role, I am one of the Bureau employees responsible for overseeing the security of the Bureau's infrastructure and the information it contains. Among other job duties, I am involved in protecting the security of, and access to the Bureau's data, computer and payment systems, and equipment (collectively Systems and Equipment). I understand the security posture of these Systems and Equipment, have extensive knowledge of the security strategies and measures that support the Bureau's enterprises, and am familiar with Bureau requirements around access to sensitive systems.
3. I was informed that Ryan Wunderly (Wunderly) is an employee of the U.S. Department of the Treasury (Treasury). To my knowledge, Wunderly has not, as of the date of this

declaration, accessed any Bureau Systems and Equipment, and has not been issued any BFS computer equipment. I understand that, at some point, execution of his job duties at Treasury may include accessing Bureau Systems and Equipment. I also understand that Wunderly is a member of Treasury's Department of Government Efficiency Team (Treasury DOGE Team).

4. I reviewed the executed declaration of Michael J. Wenzler (Wenzler), Associate Chief Human Capital Officer for Executive and Human Capital Services at Treasury's Departmental Offices. ECF No. 98-3. Wenzler's declaration states that Wunderly received and reviewed the Bureau's Rules of Behavior (Rules). ECF No. 98-3 ¶ 22. The Rules define responsibilities and procedures for the secure use of Bureau data, equipment, payment systems, and facilities. By receiving and reading this document, Bureau Systems and Equipment users acknowledge their responsibility for complying with the Rules.
5. I directed David Ambrose (Ambrose), the Bureau's Chief Security Officer/Chief Privacy Officer/Acting Chief Information Security Officer, to brief Wunderly on the Bureau's cybersecurity and Personally Identifiable Information (PII) practices and precautions. I gave Ambrose this directive to ensure that, prior to gaining access to BFS Systems and Equipment, Wunderly was aware of the sensitive nature of the Systems and Equipment, and how such information should be protected and safeguarded.
6. I also instructed Ambrose that, moving forward, Bureau security personnel should ensure that every Treasury DOGE Team member seeking access to Bureau Systems and Equipment receives the Rules and a briefing similar to the one I directed Ambrose to give to Wunderly. I further directed that each Treasury DOGE Team member or affiliate receive the Rules and the briefing before they are allowed to access any Bureau Systems and Equipment.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 03/14/2025

Signed: Nathaniel Reboja

Nathaniel Reboja

Assistant Commissioner, Information and Security  
Services and Chief Information Officer

Bureau of the Fiscal Service

United States Department of the Treasury